

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED
J.N. 5-22-08
MAY 22 2008
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA)

v.)

ABDERRAHMANE KHELLIL
also known as "Marco Lubrano")

Judge Martin C. Ashman

08CR

411

**GOVERNMENT'S MOTION TO SEAL
COMPLAINT, AFFIDAVIT, AND ARREST WARRANT**

MAGISTRATE JUDGE ASHMAN

Now comes the UNITED STATES OF AMERICA, by PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, and states as follows in support of its Motion to Seal Complaint, Affidavit, and Arrest Warrant.

Special Agent Richard Lyons of the Department of Homeland Security, Immigration and Customs Enforcement (ICE) is the primary source of information for the Application, Search Warrant, and Affidavit. The Affidavit details the facts supporting probable cause that Abderrahmane Khellil violated federal criminal law, namely, Khellil did knowingly and willfully make materially false writings knowing the same to contain a materially false, fictitious, and fraudulent statement in a matter within the jurisdiction of the Department of Homeland Security Immigration and Customs Enforcement ("ICE"), an agency within the executive branch of the Government of the United States in that the defendant falsely represented in a Form I-485, Application to Register Permanent Residence or Adjust that his place of last entry into the United States was Maryland and that he was not inspected by a U.S. Immigration Officer; in violation of Title 18, United States Code, Section 1001(a)(3). If Khellil were made aware of the facts contained in the Complaint, Affidavit and of the issuance of the Arrest Warrant, then the investigation and the execution of the Arrest Warrant

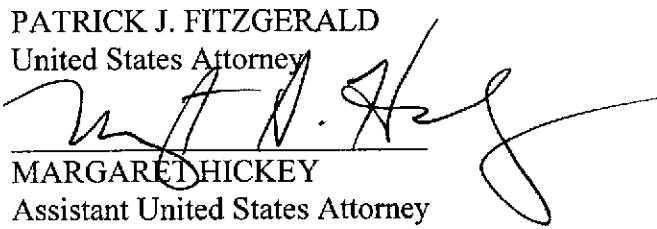
would be jeopardized, including posing a danger to the executing officers and creating a risk of flight.

For the foregoing reasons, the government respectfully requests that the Complaint, Affidavit, and Arrest Warrant be sealed until the earlier of its execution or June 22, 2008, except that the ICE may enter the Arrest Warrant into appropriate criminal databases.

Respectfully submitted,

PATRICK J. FITZGERALD
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By:



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DATE: May 22, 2008